Friends of the San Pedro River

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Dedicated to the conservation and restoration of the river through advocacy, education, and interpretation

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October 21, 2015

To Benson Planning and Zoning Commission,

Re: Proposed Vigneto Development Plan Must Address Sustainable Groundwater Use

El Dorado Benson LLC recently submitted the Final Community Master Plan and Development Plan for "The Villages at Vigneto" to Benson officials. After reviewing that plan, one key area of concern is the prospect of large-scale groundwater withdrawals to supply water to the proposed development. The developer has offered few specifics regarding water conservation and mitigation. We want to ensure that the developer is committed to measures like enhanced recharge of the aquifer and xeriscape landscaping among others. And we want to convince Benson officials that now is not the time to become complacent about our precious water resources.

The Final Community Master Plan (CMP) has sections on conceptual plans for potable, reclaimed, and storm water. However, the Conceptual Stormwater Plan focuses on flood control. Given concerns over aquifer depletion over time, that conceptual plan should also consider aquifer recharge as an explicit goal to ensure "the natural environment is enhanced or unharmed by the Development" as the Vigneto CMP summary states on page 118. Both flood control and aquifer recharge can be achieved by an integrated stormwater management design. Such an integrated design was implemented on a small scale by Cochise County at the Palominas Recharge Facility.

A recent column in The Arizona Republic featured an article by former U.S. Senator Jon Kyl and Sarah Porter, Director of the Kyl Center for Water Policy at ASU's Morrison Institute. In the article, they wrote:

> "While Arizona is not now in a water crisis, we do face some challenges that must be addressed before they become crises."
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> "Future growth may require more active management techniques under the Arizona Groundwater Management Act. Eventually, the pace of growth will likely require augmentation of our water supplies."

The message is clear. If Arizona wants to avoid California's fate with water shortages, we cannot be complacent about water resources. We must resolve to manage them proactively - not because of a shortage now, but for future generations. After 100 years of largely unconstrained growth, California's current generation is feeling the pain. Let's not pass that kind of pain on to our children and grandchildren.

For the Villages at Vigneto, we strongly encourage Benson officials to insist that El Dorado Benson LLC plan and implement water conservation measures like adopting xeriscape landscaping and mitigation strategies that include not only effluent reuse, but also both effluent recharge and near-stream stormwater recharge, e.g. above St. David Cienega. Furthermore, decision makers should take the time to properly evaluate the impact of Vigneto's projected water use on the San Pedro River, the St. David Cienega, Kartchner Caverns' cave system, and nearby property owners. The completion of the Phase III groundwater flow model by the US Geological Survey is crucial to such an evaluation. Impacts to jurisdictional waters, threatened and endangered species, migratory birds, mitigation properties and the human environment resulting from development on the additional 4,324 acres beyond Whetstone Ranch lands have not been adequately analyzed. We believe that approval of the plan is premature until those actions have been completed.

Taking the long view with regard to water resources management will ensure that future generations in Benson and St David can rely on the aquifer to meet their potable water needs while the aquifer continues to support base flows and perennial reaches of the nearby San Pedro River.

Thank you for the opportunity to share these thoughts and suggestions.

Robert Weissler
President
Friends of the San Pedro River